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11 UNITED STATES OF AMERICA

12 UNITED STATES DISTRICT COURT  
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
14 SOUTHERN DIVISION

15 UNITED STATES OF AMERICA,  
16 Plaintiff,  
17 v.  
18 RICHARD O'CONNOR,  
19 Defendant.

No. SA CR 23-27-DOC

STIPULATION REGARDING RESTITUTION

Hearing Date: December 18, 2023  
Hearing Time: 7:30 a.m.  
Location: Courtroom of the  
Hon. David O. Carter

20  
21 Plaintiff United States of America, by and through its counsel  
22 of record, the United States Attorney for the Central District of  
23 California and Assistant United States Attorney Melissa Rabbani, and  
24 defendant Richard O'Connor ("defendant"), both individually and by  
25 and through his counsel of record, Josef Sadat, hereby stipulate as  
26 follows:

27 1. On February 21, 2023, defendant signed a plea agreement and  
28 agreed to plead guilty to one count of possession of child

1 pornography, in violation of Title 18, United States Code, Sections  
2 2252A(a) (5) (B) and (b) (2). Dkt. 6. Defendant entered his plea on  
3 May 15, 2023. Dkt. 22.

4 2. In the plea agreement, defendant acknowledged that he would  
5 be required to pay full restitution to the victims of the offense to  
6 which he pled guilty, as well as the victims of any relevant conduct  
7 in connection with that offense. Dkt. 11.

8 3. The government has received requests for restitution in  
9 this case from 16 individuals: "Dipper," "Jack," "Jessy," "Chelsea,"  
10 "April," "Jenny," "Andy," "Maria," "Violet," "Sarah," "Cara," "Lily,"  
11 "John Doe 2," "John Doe 3," "John Doe 4," and "John Doe 5." The  
12 parties agree that all 16 of these individuals are "victims" in this  
13 case, meaning that each is an "individual harmed as a result of a  
14 commission of a crime" under Chapter 110 of Title 18, as provided in  
15 18 U.S.C. § 2259(c).

16 4. Defendant has agreed to pay full restitution, in the amount  
17 of \$50,000, on or before December 18, 2023, in the form of a  
18 cashier's check payable to "Clerk, U.S. District Court," with the  
19 case name and number on the "memo" line. The check shall be  
20 delivered to the Fiscal Department of the United States District  
21 Court, 255 East Temple Street, Room 1100, Los Angeles, California  
22 90012.

23 5. Defendant agrees that no payment shall be made directly to  
24 any victim.

25 6. The parties agree that restitution shall be apportioned as  
26 follows:

27 a. "Dipper": \$3,000

28 b. "Jack": \$3,000

- c. "Jessy": \$3,000
- d. "Chelsea": \$3,000
- e. "April": \$3,000
- f. "Jenny": \$3,000
- g. "Andy": \$5,000
- h. "Maria": \$3,000
- i. "Violet": \$3,000
- j. "Sarah": \$3,000
- k. "Cara": \$3,000
- l. "Lily": \$3,000
- m. "John Doe 2": \$3,000
- n. "John Doe 3": \$3,000
- o. "John Doe 4": \$3,000
- p. "John Doe 5": \$3,000

7. The parties agree that each of the amounts set forth above is a reasonable and appropriate amount of restitution to be paid to each victim.

IT IS SO STIPULATED.

Dated: December 11, 2023

/s/ Melissa S. Rabbani

MELISSA S. RABBANI

Assistant United States Attorney

Attorney for Plaintiff

UNITED STATES OF AMERICA

Dated: December 11, 2023

/s/ Josef Sadat

JOSEF SADAT

Attorney for Defendant

RICHARD O'CONNOR

Dated: December 11, 2023

/s/ Richard O'Connor

RICHARD O'CONNOR

Defendant